

**Outcomes
First
Group.**

**ACORN EDUCATION
AND CARE**

OptionsAutism

College Safeguarding Policy (England)

Norton College Tewkesbury

**DESIGNATED SAFEGUARDING LEAD:
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Safeguarding Policy

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1.0 Policy statement

Outcomes First Group is committed to ensuring that all of the children and young people we educate and care for are effectively safeguarded at all times. This policy sets out how children and young people in our colleges will be safeguarded; it applies when working offline and online, at the college and in all virtual communications.

Safeguarding and child protection must always be the highest priority and at the forefront of everything we do. A whole college approach is required to ensure safeguarding and child protection are embedded in all decisions, planning, policy and day-to-day operations and activities. **It is essential that everybody working within the Group understands their safeguarding responsibilities.**

When carrying out our duties to safeguard and promote the welfare of children, our colleges and colleges will, at all times, have regard to [Keeping Children Safe in Education \(KCISE\) 2023](#), issued under [Section 175 of the Education Act 2002](#). This is the statutory guidance that sets out the legal duties that govern all colleges and colleges in England educating children.

- Governing bodies, proprietors, college leaders, the Designated Safeguarding Lead (DSL) and deputy must read the whole guidance document.
- Governing bodies and proprietors must ensure that staff who work directly with children read and understand Part 1 and Annex B.
- Staff who do not work directly with children can read and understand either [Part one](#) or Annex A if it is more effective to enable them to safeguard and promote the welfare of children.

Settings providing Early Years education have a duty to comply with the welfare requirements of the [Early Years Foundation Stage Framework \(EYFS\)](#) under [Section 40 of the Childcare Act 2006](#)

[Working Together to Safeguard Children 2023](#) sets out what individuals, organisations and agencies must and should do to keep children safe and emphasises that effective safeguarding is achieved by putting children at the centre and by every individual and agency playing their part.

All staff and volunteers working directly or indirectly with children and young people for Outcomes First Group **must** ensure that:

- Children and young people feel safe and that they are listened to;
- they create an environment and culture in which children and young people feel valued;
- the best interests of the child or young person are always considered and acted upon;
- safer recruitment procedures (set out in the Group's *Safer Recruitment Policy*) are rigorously followed;
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they understand that children and young people with special educational needs or disabilities (SEND), certain medical or physical health conditions can face additional safeguarding challenges both online and offline;
- they are vigilant in monitoring possible signs of abuse, including for those pupils who have complex learning difficulties or communication needs, who may be particularly vulnerable;
- they are aware that children can abuse other children (i.e. child-on-child abuse).
- they maintain an attitude of **'it could happen here'**;
- they follow the appropriate procedures in place for sharing safeguarding concerns, including low-level concerns, and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- pupils have opportunity to learn about appropriate relationships with adults and other children and recognise unacceptable behaviour by adults and other children.
- There is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 What is safeguarding and child protection?

2.1 Safeguarding

Safeguarding relates to the action taken to promote the welfare of children to protect them from harm. This policy includes the safeguarding of young adult learners within Outcomes First Group colleges, colleges and other settings and applies both offline and online.

Safeguarding is defined in [Working Together to Safeguard Children 2023](#) as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

2.2 Contextual Safeguarding

Outcomes First Group adopts a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, colleges and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.'* (Dr Carlene Firmin)

2.3 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

2.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, Outcomes First Group believes that safeguarding is everyone's responsibility. The Group expects that, without exception, staff keep children and young people at the centre of all that they do and that any actions taken are in the best interests of the child or young person. We also expect that children and young people are listened to, and their voices are always heard.

2.5 Defining Significant Harm/Child Abuse

2.5.1 The [Children Act 1989](#) introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under [Section 47](#) of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

2.5.2 Under [Section 31](#) of the Children Act as amended by [Adoption and Children Act 2002](#):
'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;
'health' means physical or mental health; and
'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical.
Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

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2.5.3 There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect
- Physical Abuse
- Emotional Abuse
- Sexual Abuse.

2.5.4 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and harm online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- children can abuse other children (child-on-child abuse), this can happen both inside and outside of college and online.

2.5.5 'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' ([Working Together to Safeguard Children 2023](#))

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. ([KCSiE 2023](#))

All staff must be aware of the signs and indicators of child abuse (Please see 7.6 for further information)

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

3.0 Local Arrangements for the college

- 3.1** All staff must be aware of the local arrangements for safeguarding relevant to the college in which they work;
- 3.2** The local arrangements for are as follows:
- 3.3** Norton College Tewkesbury safeguarding arrangements are in line with local safeguarding partnership arrangements. The Gloucestershire LA safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area)
- 3.4** The Local Authority Designated Officer or local equivalent is Nigel Hatton, 01452 426994 and nigel.hatton@gloucestershire.gov.uk.
- 3.5** All safeguarding referrals must be reported to the local authority 01452 426565 or childrenshelpdesk@gloucestershire.gov.uk. Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult safeguarding arrangements.
- 3.6** The local authority safeguarding referral procedure is to follow Gloucestershire Safeguarding Children Partnership (GCSP) by submitting a Multi-agency request form (MARF).
- 3.7** For all referrals regarding radicalisation by contacting prevent@gloucestershire.police.uk or by completing the prevent form online.
- 3.8** For all referrals regarding exploitation contact Gloucestershire multi agency safeguarding hub on 01452 426565 or email childrenshelpdesk@gloucestershire.gov.uk.
- 3.9** The local authority procedure for an early help referral is dependent on the local authority the student resides in.
- 3.10** The Chair of Governors for Norton College Tewkesbury is: Gemma Mann
- 3.11** The Outcomes First Group Head of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

4.0 The role of governors, the proprietor and senior managers

4.1 Governing bodies and proprietors have a strategic leadership responsibility for their college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must read the whole [KCSiE 2023](#) guidance document and have regard to it at all times, ensuring policies, procedures and training in their colleges are effective and comply with the law at all times. They must have oversight of the safeguarding policies and procedures and ensure that they are being effectively implemented within the college and that training is effective.

Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please refer to section 8.0 of this policy and see the Group's *Safer Recruitment Policy* for further information.

4.2 Governing bodies and proprietors should:

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their colleges safeguarding arrangements'. The named Governor for the college is Gemma Mann
- Ensure that the college contributes to multi-agency working in line with [Working Together to Safeguard Children 2023](#)
- Be aware of the local multi-agency safeguarding arrangements.
- Receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the college are effective and support the delivery of a robust whole college approach to safeguarding. Their training should be regularly updated.
- As part of the whole college safeguarding approach, they must create a culture that safeguards and promotes the welfare of children and young people in their college. This includes ensuring that robust recruitment procedures are in place that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in colleges. (Please see the Group *Safer Recruitment Policy*).
- Be responsible for ensuring an appropriate senior member of staff, from the college leadership team, is appointed to the role of **designated safeguarding lead (DSL)**. With the support of governors, proprietors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **This should be explicit in the role-holder's job description.**
- Be aware of their obligations under the [Human Rights Act 1998 \(HRA\)](#) and the [Equality Act 2010](#), which require colleges to:
 - Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
 - Carefully consider how pupils are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting those with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled pupils and those with long term conditions.
 - Guidance to help colleges understand how to fulfil their duties under the [Equality Act \(2010\)](#) is available on the DFE website: [Advice for colleges](#)
- Ensure that pupils are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual pupils.

- Do all that they reasonably can to limit pupil's exposure to online risks from the college's system, including:
 - Ensuring the college has appropriate filters and monitoring systems in place, that are informed in part by the risk assessment required by the [Prevent Duty](#), and that their effectiveness is regularly reviewed.
 - Work closely with senior leaders, the DSL and IT service providers in all aspects of filtering and monitoring.
 - Ensuring that the college leadership team and relevant staff have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age range and developmental age of their pupils, the number of pupils and their needs, how often they access the IT system and the proportionality of costs versus safeguarding risks.
- Adhere to the DFE guidance [Meeting digital and technology standards in colleges and colleges](#) that requires colleges to:
 - identify and assign roles and responsibilities to manage filtering and monitoring systems.
 - review filtering and monitoring provision at least annually.
 - block harmful and inappropriate content without unreasonably impacting teaching and learning.
 - have effective monitoring strategies in place that meet their safeguarding needs
- Review the standards and discuss with IT staff and service providers what more needs to be done to support colleges and colleges in meeting this standard.

[Cyber security standards for colleges and colleges](#) can be found here and broader guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for college staff - NCSC.GOV.UK](#)

4.3 Where there is a safeguarding concern, governing bodies, proprietors and college leaders should ensure the child/young person's wishes and feelings are taken into account when determining what action to take and what services to provide. This has to be balanced with their duty to protect the victim and other children.

5.0 Designated Safeguarding Lead (DSL)

5.1 With the support of the governing body and proprietor, the Head of school (or equivalent) must appoint one individual to be the lead DSL and make arrangements for there to be a deputy DSL who will manage any immediate safeguarding incidents in the DSL's absence. The DSL must be an appropriate senior member of the leadership team and, along with deputies, will receive DSL training every two years.

5.2 The Head of school (or equivalent) must ensure that job descriptions for the DSL and Deputy DSL are kept on personnel files and clearly state their responsibilities.

5.3 The DSL (or deputy) must always be available during college hours for staff to discuss any concerns.

5.4 The main responsibilities of the Designated Safeguarding Lead (DSL) are to:

- provide support to staff regarding safeguarding concerns;
- lead on advising staff of any action to be taken due to a safeguarding concern;
- ensure that children and young people are immediately safeguarded from harm and abuse;
- ensure that there is appropriate cover during their absence, and that staff know who to approach if the DSL is unavailable;

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- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
 - adopt a child-focused and holistic approach ensuring the child/young person's wishes and feelings are taken into account when determining what action to take
 - refer allegations to the Local Authority Designated Officer or local equivalent;
 - refer safeguarding concerns to placing and host local authorities;
 - refer suspected cases of radicalisation to Channel;
 - refer suspected case of FGM, Child Sexual Exploitation and trafficking to the police;
 - refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to a child;
 - liaise with the Group Head of Safeguarding/ Safeguarding Adviser and HR Team if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer for the Group;
 - ensure that the college complies with the work of the local safeguarding partnership.
 - ensure that all staff receive regular update training in relation to safeguarding;
 - provide safeguarding updates to senior managers and college governors; this is done through weekly SLT meetings, weekly governance reports and 3 yearly governance meetings.
 - keep the Head of school (or equivalent) informed of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (See [PACE Code C 2019](#) and DFE Guidance, [Searching, Screening and Confiscation](#) for further information)
 - ensure that there is effective monitoring and oversight of all safeguarding concerns;
 - promote the educational achievements of Looked After Children in line with the [Children and Social Work Act 2017](#)
 - have details of the social worker for any looked after children and the name of the virtual college head in the relevant authority for any children with a social worker or previously looked after.
 - Work closely together with IT Services and providers to meet the needs of the setting and requesting system specific training and support as and when required.
 - Take lead responsibility for any safeguarding and child protection matters that are picked up through web filtering and monitoring systems in place, (Please see Web Filtering and monitoring Policy). This includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to the filtering and monitoring systems.
 - Investigate any attempted access of inappropriate sites as soon as possible and take appropriate action; and refer appropriately any attempted access of websites related to extremism under Prevent duties and local arrangements for reporting.
 - have a thorough knowledge and understanding of the full [KCSiE 2023](#) guidance.
- 5.5** It is important that all staff understand the role of the DSL on their appointment within the college and as part of their induction. The DSL is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child-focused approach is taken. The DSL will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding.
- 5.6** The DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns, including low level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each pupil. Records should include:
- a clear and comprehensive summary of the concern;

- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, staff should discuss with the DSL (or deputy).

5.7 Data protection and GDPR are not barriers to record keeping or information sharing when promoting a child's welfare. Colleges have clear powers to share, hold and use information for these purposes. The college should have clear arrangements in place for the processes and principles for sharing information within the setting, with other divisions within the Group and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. Staff are required to be proactive in sharing information as soon as possible when it is in relation to a child's safety or wellbeing.

5.8 When pupils leave the college, the DSL is responsible for ensuring that the necessary information is shared with the new college or college. It is the DSL's responsibility to ensure that the pupil's child protection file is transferred to the new college or college as quickly as possible and as securely as possible. This should be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new college to have support in place for when the child/young arrives. **Files must be transferred securely;** the child protection file should be transferred separately from the main pupil file. Confirmation of receipt must be obtained. Colleges must inform their Local Authority of all deletions from their admission register when a pupil is taken off roll.

6.0 Safeguarding Training and Updates for all staff

6.1 Governing bodies and proprietors should ensure that, as part of the safeguarding requirements for staff and to ensure children are taught about safeguarding, that the safeguarding training is integrated, aligned and considered as part of the whole college safeguarding approach, wider staff training and curriculum planning. They must regularly review the training programme to ensure that it includes all the required knowledge and that staff understand how it is to be implemented.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

6.2 All staff are expected to follow this policy and related statutory guidance.

6.3 All staff must read the following documents:

Part 1 (or Annex A where appropriate) of [KCSiE 2023](#)

The College's:

- Restrictive Physical Intervention Policy
- Behaviour Policy
- Anti-bullying policy
- Low level concerns Guidance & Procedure
- Child-on-child abuse policy and Harmful Sexual Behaviour Guidance
- Child Exploitation policy
- Protecting Children from Radicalisation policy
- Web Filtering and Monitoring policy
- Mobile and Smart Technology Policy (within staff code of conduct)
- Medication Policy

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- Description and guidance of the role of the DSL and the role of the Deputy DSL

Outcomes First Group's: (for any policies we do not currently have, these will be distributed when they are received)

- Group Safeguarding Statement
- The Use of Restrictive Practices and Restraint Terms of Reference
- Suspension and Permanent Exclusion Policy
- Safer Recruitment policy
- Data Protection policy
- Staying Safe Online
- Gaming Devices Best Practice Guidance
- Whistle blowing and complaints policy
- Code of Conduct & Ethics Policy
- Photography of Injuries and Medical Conditions Policy
- Serious Incident Escalation Policy

Staff should also be aware of the following DFE Guidance:

- [Working Together to Safeguard Children 2023](#)
- [Sexual violence and harassment between children in colleges and colleges](#)
- [Children Missing in Education](#) and [Working together to improve college attendance](#)
- [Promoting the Education of Looked After Children](#)
- [Teaching Online Safety in Colleges](#)
- [Sharing nudes and semi-nudes: advice for education settings](#)
- [Searching, Screening and Confiscation](#)
- [Harmful Online Challenges and Online Hoaxes](#)
- [Preventing and tackling bullying](#)
- [Mental health and wellbeing support in colleges and colleges](#)
- [Behaviour in colleges: advice for head of schools and college staff](#)
- [SEND code of practice: 0-to-25 years](#)
- [Information Sharing: Advice for practitioners providing Safeguarding Services](#)

[Supporting practice in tackling child sexual abuse](#) - CSA Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

6.4 The College/College will provide regular safeguarding updates to staff, either through face-to-face training, meetings or through regular written updates.

All staff must complete the mandatory training:

- Introduction to Safeguarding (e-learning) to be completed within the first week of employment.
- The annual KCSiE e-learning course that provides updated statutory information and requirements that all education staff must be aware of.
- **DSL** must refresh their advanced training **at least every two years.**

If a service has a specific need or issue in relation to Safeguarding, then they can request a closed virtual or closed face-to-face course to support with the need. Contact details for setting's Regional Training Manager can be found on Engage:

<https://app.employeeapp.co.uk/page/3621>

6.5 All members of college leadership teams, including the Head of school (or equivalent) and DSL should also be familiar with [Working Together to Safeguard Children 2023](#)

7.0 Roles and Responsibilities of Staff

7.1 The Group recognises that it is not just one person's role to safeguard children and young people. It requires a collective approach to safeguarding. All employees must understand their roles and responsibilities regarding keeping children and young people safe and reporting concerns.

7.2 During staff induction, staff will receive safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff must be familiar and understand the role of the DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the college. Staff must also know, understand and implement the college's behaviour management policy, the staff Code of Conduct and the safeguarding response to children who are absent from education or are missing from education [KCSiE 2023](#)

7.3 Staff are responsible for:

- compliance with the Group's policies, statutory guidance and legislation including [KCSiE 2023](#) and [Working Together to Safeguard Children 2023](#)
- understanding the role of the DSL;
- attending training and meetings;
- helping to develop and deliver a curriculum which helps children to understand about abuse, appropriate and safe relationships with adults and other children, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued;
- ensuring they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to pupils absent from college or missing from education;
- listening to pupils;
- supporting pupils if they disclose safeguarding information;
 - ensuring that they are alert to signs of abuse by other children or adults and aware of indicators or possible signs of neglect;
 - ensuring that they closely monitor any possible signs of abuse or harm for those pupils who are unable to communicate verbally or who have complex health and care needs;
 - keeping sensitive information confidential and sharing it only with professionals for whom it is relevant;
 - helping to identify those pupils who may benefit from Early Help;
 - helping to implement Child Protection Plans.

7.4 Staff are in a close position to children within colleges and have regular contact with them, so are in the best position to know if a child is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, no matter how small they may seem, must be reported immediately to the DSL both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

7.5 All staff should be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Staff must

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maintain professional curiosity and be alert to changes in a pupil's behaviour. Staff must speak to the DSL if they have any concerns about a pupil. It is also important that staff determine how best to build trusted relationships with pupils to facilitate communication.

- 7.6** Some common signs staff should be alert to that may indicate something concerning may be happening in a child or young person's life include:
- unexplained changes in behaviour or personality
 - becoming withdrawn or seeming anxious
 - becoming uncharacteristically aggressive
 - lacks social skills and has few friends if any
 - poor bond or relationship with a parent
 - knowledge of adult issues inappropriate for their age
 - running away or going missing
 - always choosing to wear clothes which cover their body.

These signs do not necessarily mean that a child or young person is being abused, there could be other things happening in their life which are affecting their behaviour. Staff should discuss any concerns with the DSL.

For children and young people with special educational needs or disabilities (SEND), and multiple complex co-occurring needs, it can be difficult for staff to distinguish between signs of abuse and behaviour that is part of the child or young person's condition. Staff should be alert to **changes** in their behaviour and always consider all possible causes of this.

Please also see: [Children with disabilities - Safeguarding our most vulnerable](#)

- 7.7** Being Lesbian, gay, bisexual transgender, queer, questioning and/or ace (LGBTQ+) is not in itself an inherent risk factor for harm. However, pupils who are LGBTQ+, or are perceived to be LGBTQ+, can be targeted by other children and young people. Risks can be compounded where pupils who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Please note: The DfE refer to 'LGBT' in its guidance. Outcomes First Group has chosen to use the term 'LGBTQ+', because this abbreviation appears to be most inclusive and commonly used by the community.

- 7.8** Looked after children and previously looked after children can potentially remain vulnerable and all staff should have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. It is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- 7.9** If the college becomes aware that a child is subject to a private fostering arrangement, the local authority must be informed so they can assess and support them to ensure it is a safe place for the child. Private foster carers are people who are not a close relative to a child but plan to look after them for 28 days or more. Staff should inform the DSL immediately if they become aware of a private fostering arrangement.
- 7.9** Staff should be aware that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships as teenagers. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

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The Head of school (or equivalent) and DSL should be familiar with [Operation Encompass](#) which enables colleges and police to work together to provide emotional and practical help to pupils, where police have been called to an incident of domestic abuse in the household.

- 7.10** The College must ensure that pupils know:
- how to report any concerns and feel confident that they will be listened to and supported.
 - They can also report any concerns by emailing tellus@ofgl.co.uk, which is monitored by the Outcomes First Group's Quality Team.
 - Are aware they can contact the NSPCC dedicated helpline on [0800 136 663](tel:0800136663) or by emailing help@NSPCC.org.uk
 - Are aware of how to contact Childline ([0800 1111](tel:08001111))

8.0 Safer Recruitment

8.1 The Outcomes First Group's *Safer Recruitment Policy* sets the processes which must be followed for the recruitment of staff and volunteers, which includes the requirement for enhanced DBS and other checks. Colleges and colleges must inform shortlisted candidates that online searches may be done as part of pre-recruitment checks.

8.2 It is the responsibility of the Head of school (or equivalent) to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.

8.3 It is the responsibility of the hiring manager at the college to ensure that copies of the documents used to verify the successful candidate's identity, right to work, required qualifications and references should be kept on their personnel file. The Head of school (or equivalent) and Safeguarding Governor should conduct regular audits to assure themselves that the correct documents are in place and stored safely.

Colleges do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. If they do retain them there must be a valid reason for doing so and it should not be kept for longer than six months as they are covered by UK GDPR/DPA 2018 Article 10.

9.0 Early Help

9.1 *'A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989' (KCSIE 2023)*

9.2 It is important that staff take swift and effective action to safeguard children and young people and to stop concerns from escalating. It may be that they will benefit from Early Help. All staff should be aware of their local early help process and understand their role in it.

9.3 Staff must be aware and alert to the possibility of Early Help being needed for those pupils who have particular vulnerabilities, such as those who:

- are disabled or have certain health conditions and specific additional needs;
- have special educational needs (whether or not they have a statutory EHCP);
- have a mental health need;
- are young carers;

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- are frequently missing/goes missing from care or from home;
- are persistently absent from college, including persistent absences for part of the day.
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are at risk of modern slavery, trafficking, sexual or criminal exploitation, of being radicalised or exploited;
- are in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues, domestic abuse; a family member is in prison, or is offending;
- are misusing drugs or alcohol themselves;
- have returned home to their family from care;
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- are privately fostered;

9.5 Children's social care assessments should consider where children are being harmed in contexts outside the home. It is important that colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm

9.6 When a pupil has been referred for Early Help, it is the responsibility of the DSL to set up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration must be given to a referral to children's social care for assessment for statutory services if the pupil's situation does not appear to be improving or is getting worse.

10.0 Reporting concerns

10.1 What to do if a pupil discloses

Well promoted, easily understood and easily accessible systems should be in place for pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a pupil discloses information to a member of staff, they must ensure that they:

- listen to the pupil and reassure them they are being taken seriously and that they will be supported and kept safe.
- never give them the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report.
- do not dismiss what the pupil tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. The member of staff must explain that they have a duty to share information to keep them safe and protect them;
- write down what the pupil tells them. This must be accurate and in the pupil's words;
- immediately report the concerns to the DSL or deputy. If neither is available, the member of staff must report the information to the Head of school (or equivalent) or Regional Director.

10.2 Staff must be alert to not just potential familial abuse and allegations, but also to pupils making allegations against staff, volunteers or other children. In these situations the colleges Managing Allegation Procedures must be followed. (See Section 24 for further details).

10.3 All concerns, however small they may seem, **must** immediately be reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the college's electronic recording system. The member of staff has a responsibility to ensure that action has been taken about the concern on the **following day**, and that the concern is

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documented on the system. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to the Head of school (or equivalent) or Regional Director.

- 10.4** Staff must prioritise the pupil's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.
- 10.5** On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director, and where relevant, the Local Authority Designated Officer or local equivalent.
- 11.0 Managing Referrals to Disclosure and Barring Service (DBS) and professional bodies**
- 11.1** As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS).
- 11.2** The Head of school (or equivalent) of the setting is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Head of school (or equivalent) must be familiar with, and follow, the national requirements and make the referral at the appropriate time.
- 11.3** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**
- 11.4** If a referral is made, at the point of completion the Head of school (or equivalent) must notify safeguarding@ofgl.co.uk and the Human Resources Advisor hropertationsadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
- 11.5** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.
- 11.6** Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).
- 12.0 Partnership working and sharing information**
- 12.1** Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.
- 12.2 General Data Protection Regulations**
- All colleges must ensure that they comply with the Outcomes First Group's Data Protection policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to pupil's personal information, as well as that of staff and parents/carers.

GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required.

Information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent;
- the college cannot reasonably be expected to gain consent; and
- if to gain consent would place a child or adult at risk.

Where there is any doubt, the DSL should contact the Group's Legal Team for clarification.

All staff must complete the GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements.

- 12.3** Colleges must ensure that they inform pupils, parents and carers of how their personal information will be stored and used.
- 12.4** Colleges must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with [KCSiE 2023](#) colleges must hold more than one set of contact details for each pupil, where reasonably possible.
- 12.5** Data breaches must be reported immediately to Group's Data Protection Officer as set out in the Group's Data Protection Policy.

Please also see:

[Information Sharing Advice for Safeguarding Practitioners](#) (Please that this advice is currently under revision, an updated draft is being consulted on: [DRAFT Information Sharing Advice](#))

[Improving multi-agency information sharing \(publishing.service.gov.uk\)](#)

13.0 Child-on-child abuse

- 13.1** All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), children of differing ages, as well as similar ages, can abuse one another.

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police. Colleges should be part of discussion with statutory safeguarding partners.

- 13.2** It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between pupils. In addition to the information below, staff should familiarise themselves with the College's *Child-on-Child Abuse Policy*.

[KCSiE 2023](#) states: "**Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.**"

- 13.3** Staff must ensure that they create a college environment where pupil safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Staff must be aware and alert to

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incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils and bullying.

This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Staff must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

- 13.4** All staff should understand, that even if there are no reports in their colleges, it does not mean it is not happening, it may be the case that it is just not being reported. Staff are advised to maintain an attitude of **'it could happen here'** and be vigilant to any signs.
- 13.5** It is important that staff are aware that pupils may not find it easy to tell an adult about their abuse. Pupils can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of college staff may overhear a conversation that suggests a pupil has been harmed or a pupil's own behaviour might indicate that something is wrong. If staff have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told. **Staff must act immediately and report any concerns regarding child-on-child abuse to the DSL.**
- 13.6** It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the college should not be downplayed and should be treated equally seriously.
- 13.7** Staff should explain to pupils in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.
- 13.8** Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence, such as rape, assault by penetration and sexual assault
 - sexual harassment, e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent,
 - consensual and non-consensual sharing of nude and semi-nude images and or videos
 - upskirting
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)

These forms of abuse can happen inside or outside of college both offline and online.

- 13.10** A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or pupils. Staff must not dismiss any concerns brought to them by pupils. Staff can report concerns verbally, but they

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must ensure that all concerns are recorded onto the college's electronic recording system by the end of the college day.

13.11 It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different college.

13.12 When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Colleges must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

13.13 DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

13.14 The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the college is the priority. Risk assessments must be implemented where necessary.

13.15 Where the DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

13.16 After the outcome/conclusion of the incident:

- a contextual safeguarding approach must be taken;
- colleges must take all necessary action to learn from the incident and prevent future incidents occurring, such as through targeted education around specific types of child-on-child abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- colleges must ensure that they **do not** adopt a victim blaming approach;
- the DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

14.0 Bullying (Please also see the College's *Anti-bullying policy*)

14.1 Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable.

14.2 The Group has a zero-tolerance approach to bullying. Staff must help pupils to understand

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what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

- 14.3** Colleges have a responsibility to ensure that those pupils who bully, are supported and helped to understand the impact of their actions.
- 14.4** Please see the following government guidance on preventing and tackling bullying in colleges: [Preventing and tackling bullying](#) , [Mental health and behaviour in colleges](#)
[Behaviour in colleges: advice for head of schools and college staff](#)
See [Rise Above](#) for links to materials and lesson plans

Information on the Group's [Wellbeing and Clinical Services](#) can found on Engage.

15.0 Preventative Strategies

- 15.1** It is important that pupils are taught about how to keep themselves and others safe, including online. This preventative education will be effectively tailored to the specific needs and vulnerabilities of individual pupils.

For pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual pupil's needs and be included in their Care Plan.

- 15.2** The college will take all appropriate action to ensure that pupils learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships. Relationship, Health and Sex Education (RSHE) lessons, Relationships Education, and

Relationships and Sex Education will focus on important age-appropriate issues in line with Government guidance. Staff must ensure that pupils have opportunity to learn about safe relationships between peers as well as who they can talk to if they have any concerns.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help colleges counter homophobic, biphobic and transphobic bullying and abuse.

A one-stop page providing teachers with support in teaching RSHE topics can be found here: [Teaching about relationships sex and health](#)

- 15.3** Pupils will be supported by staff to understand what abuse is. Pupils must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse, and be able to access in private relevant websites or helplines such as Childline to seek advice and help.
- 15.4** The college recognises that some pupils are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the DS Lead.
- 15.5** Please also refer to Part Five of [KCSiE 2023](#): Child-on-Child Sexual Violence and Harassment.

16.0 Online Safety and Security

- 16.1** There is a whole college/setting approach to online safety to help equip pupils with knowledge and understanding to stay safe online. The college helps and supports its pupils to recognise and avoid online safety risks and to help build their digital resilience. This is integrated into

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everyday learning and covered in detail as part of the RSHE curriculum.

There are a range of resources to provide support for online safety in colleges at: childnet.com

Pupils those who are non-verbal or have limited receptive and expressive communication and learning disabilities will need further support. (Please see 15.1).

16.2 The college will work with parents and carers to help keep pupils safe online. Parents and carers will be informed about what their children are being asked to do online, including the sites they will be asked to access and if their child will be interacting with others online. The *Web Filtering & Monitoring Policy* includes information about the systems used to filter and monitor online use.

16.3 The Group requires safe and secure systems to be put in place within colleges that limits the exposure to such risk. The Group operates a highly secure web filtering system on the internet link to the setting to safeguard the college's computers and internet use, and also offers safeguards on mobile phones and tablets used over the setting's Wi-Fi network.

Web filtering and monitoring helps to keep pupils safe from illegal and inappropriate content and that they are protected from extremism online when using the setting's Wi-Fi. The college works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate for the college, and are informed in part, by the risk assessment required by the Prevent Duty. The filtering and monitoring systems are reviewed at least annually.

South West Grid for Learning <https://swgfl.org.uk/> have created a [testing tool](#) that can be used to check the filtering system is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

16.4 **If a member of staff has reason to believe that a pupil is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.**

16.5 If staff become aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the pupil.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the pupil's placing authority and family as appropriate.
- Review the supervision and support arrangements for the pupil accessing the internet.
- Check the privacy and security settings on the pupil's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the pupil.

16.6 Digital technology and its related risks are developing rapidly. An annual review of the college's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks pupils face. A free online safety self-review tool for colleges can be found at <https://360safe.org.uk/> or [LGfL online safety audit](#)

16.7 UKCIS provide a range of resources to support colleges to further develop a whole college approach towards online safety: [Using external expertise to support online safety education](#)

Further helpful resources for online safety:

UK Safer Internet Centre: [Appropriate Filtering and Monitoring](#)

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings](#)

DFE Advice [Harmful Online Challenges and Online Hoaxes](#)

National Crime Agency's CEOP education programme: [ThinkuKnow](#)

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LGFL [Undressed](#) provides advice about how to teach children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

17.0 Children who are absent from education

17.1 All staff must be aware of the risks associated with children who are absent from education, for prolonged periods and/ or on repeat occasions that can often be a vital warning sign of a range of safeguarding concerns including neglect, child sexual and child criminal exploitation, forced marriage, FGM, substance misuse or mental health problems.

Early identification and intervention is a priority. Colleges must have appropriate procedures in place for monitoring the attendance of pupils in college. Attendance must be monitored through Senior Leadership Team Meetings and Governance.

17.2 The DSL must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil absent from education.

Staff must report all unauthorised absences to the DSL, who will arrange for contact with the pupil's parent/carer immediately to establish the pupil's whereabouts. The DSL must inform the placing authority of pupils who are frequently absent.

17.3 The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a pupil who is absent from education. The DSL **must** refer any safeguarding concerns regarding the absence of the pupil to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

17.4 Pupils who are repeatedly absent from education are at particular risk of harm. Attempts must be made to talk to the pupil about why they are absent from education. Records must be kept of those discussions. Any safeguarding information which the pupil discloses must be shared **immediately** with the local authority. If the pupil discloses immediate safeguarding concerns, the DSL must share this information with the police.

17.5 The risk of exploitation and abuse increases for children and young people who go missing from home and college. It is important the college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child in need, or already has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Please also see: [Children Missing in Education](#) and [Working together to improve college attendance](#) guidance, which includes information on how colleges should work with local authority children's services where college absence indicates safeguarding concerns.

18.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

18.1 Exploitation is a form of child abuse and can include sexual and/ or criminal exploitation. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

18.2 CSE and CCE can affect boys and girls and can include children who have been moved

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(referred to as trafficking) for the purpose of exploitation. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal exploitation. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

- 18.3** All staff **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DSL must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.
- 18.4** Staff **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.
- 18.5** It is the responsibility of all staff to help children and young people know about grooming and exploitation. Colleges must ensure that pupils know who to talk to if they have any concerns for themselves or other children.

Please also see [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)

19.0 Serious violence

- 19.1** All staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 19.2** All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further guidance for professionals can be found here:

[Advice to colleges and colleges on gangs and youth violence](#)

[Criminal exploitation of children and vulnerable adults: county lines](#)

[County Lines Toolkit For Professionals](#) includes information on the signs of a child's involvement in county lines, published by the Home Office and The Children's Society.

20.0 'Honour'-based abuse including Female Genital Mutilation (FGM) and Forced Marriage

- 20.1** Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

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- 20.2** HBA can affect people of all ages, but often begins early in the family home. Girls and women are particularly at risk; however boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.
- 20.3** HBA can take many forms, it can include: forced marriage; female genital mutilation; Breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.
- 20.4** **If staff have a concern regarding a child or young person who might be at risk of HBA or who has suffered from HBA, they must speak to the DSL (or deputy).** As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.
- 20.5** **Teachers and support staff, along with regulated health and social care professionals in England and Wales, have a specific legal duty to report concerns regarding Female Genital Mutilation (FGM),** ([under Section 5B of the Female Genital Mutilation Act 2003, section 74 of the Serious Crime Act 2015](#)) If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. In suspected cases of FGM, staff must refer to the local authority as well as the police. The DSL will assist and support staff with this.
- 20.6** Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>
- 20.7** Since February 2023, the legal minimum age to enter into a marriage in England and Wales is 18. In these nations, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email fm@fcdo.gov.uk
- A [Forced marriage resource pack](#) has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.
- Multi-agency statutory guidance for dealing with **forced marriage**, can found at: [The right to choose government guidance on forced marriage](#)
- 20.8** The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the Regional Director and Chair of Governors, and that staff have documented them appropriately.
- 21.0** **Preventing Radicalisation and the Prevent Duty**
- Staff must be familiar with the Protecting Children from Radicalisation Policy**
- 21.1** Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and protect children and young people from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on colleges to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the [Prevent Duty](#)

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- 21.2** All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist staff to report all concerns regarding radicalisation to the Police as well as the Regional Director. Staff must document their concerns appropriately.
- 21.3** To safeguard children and young people who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at: [Understanding and identifying radicalisation risk in your education setting](#)
- 21.4** DFE has produced a Self-assessment tool to help colleges in England review their responsibilities under the Prevent duty, which can be found here: [Prevent duty self-assessment tool for colleges](#) The tool helps colleges to understand how well embedded their existing policies and practices are, and to encourage a cycle of continuous review and improvement. It contains requirements and recommended good practice activities to meet those requirements.
- 21.5** All staff must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Pupils requiring support with their Mental Health

- 22.1** The Group recognises that colleges have an important role in supporting the health and wellbeing of their pupils.
- 22.2** Mental ill-health can be an indicator of a child or young person suffering or at risk of abuse, neglect or exploitation. All colleges should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support.

This will ordinarily be with the consent of the child/young person and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the college's electronic recording system.

- 22.3** Colleges can refer to the [Mental Health and Behaviour in Colleges guidance \(2018\)](#) The guidance provides advice on how to create a whole college culture in promoting positive mental health outcomes for children and young people.

Public Health England provide [Every Mind Matters](#) to help teach RSHE providing simple, practical advice for a health mind.

Information on the Group's [Wellbeing and Clinical Services for children & young people](#) can be found on Engage.

23.0 Physical Interventions

All staff must read and know the college's Physical Intervention Policy.

- 23.1** While every college creates an atmosphere of nurturing, unconditional positive regard and warmth, the Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child/young person is safe and calm, it is essential that there is a debrief with them. It should be an open discussion with the member of staff encouraging the pupil to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the College's Electronic Recording System.

- 23.2** If a pupil makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate electronic record. Staff must also

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verbally inform the DSL (or deputy) and record it onto the colleges electronic recording system. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers/ those with parental responsibility.

Allegations of harm relating to physical interventions must be reported to the Regional Director, the Group Head of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or local equivalent.

24.0 Allegations against staff

24.1 An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff, volunteer or contractor has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or relate to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

24.2 All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Regional Director and the DSL.

24.3 When a pupil makes an allegation about a member of staff, the member of staff receiving the complaint must:

- write everything down and document it on the college's electronic recording system.
- immediately report the allegation to the DSL (or deputy).

The DSL must:

- take all allegations seriously regardless of whether a pupil has made previous allegations;
- report allegations to the Local Authority Designated Officer or local equivalent within one working day;
- ensure that they follow the Allegations Against Staff Policy .

24.4 Part four of [KCSiE 2023](#) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the college setting. Whilst the individual may not be employed by Outcomes First Group, **colleges must ensure** that allegations are managed properly. [KCSiE 2023](#) states: *'In no circumstances should a college or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of colleges of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the college or college, whilst they carry out their investigation.'*

24.5 If the allegation is regarding the Head of school (or equivalent) then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

24.6 All allegations made against staff must be reported to:

- the Regional Director
- Human Resources (hropertionsadvice@ofgl.co.uk)

- Group Safeguarding Team (safeguarding@ofgl.co.uk)

Outcomes First Group recognises that managing allegations can be challenging and will support with the process. Please refer to the Managing Allegations Procedure for further details.

24.7 It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

25.0 Low-level concerns

Staff must read and follow the College's *Low-level concerns guidance & procedures*

25.1 Staff must understand what low-level concerns are and be aware of the process for addressing low-level concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the college** may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent. ([KCSiE 2023](#))

Examples may include but are not limited to:

- being over friendly with children; erosion of boundaries
- taking photographs of children on their personal mobile phone;
- having favourites; engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

25.2 All low-level concerns must be shared with the Head of school (or equivalent) or DSL. The **DSL must inform the Head of school (or equivalent)** of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern. **The Head of school (or equivalent) is the ultimate decision maker in respect of low-level concerns.**

If there are concerns about the head of school/principal these concerns should be referred to a senior member of the Group (such as the Regional Director, Operations Director, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

25.3 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

25.4 Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Head of school (or equivalent) should decide on an appropriate course of action.

26.0 Working with the Local Authority Designated Officer or local equivalent

In all referrals, the DSL is the lead professional within the college for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Head of school/or equivalent or Governors of the college to agree further action.

27.0 Whistleblowing

Document Type: Policy

Last Review Date: September 2023

Policy Owner: Group Head of Safeguarding

Next Review Date: September 2024

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- 27.1** Safeguarding is everyone's responsibility. The Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. The Group also recognises that pupils will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.
- 27.2** Staff have a duty first and foremost to the pupils in their college. Any concerns, regardless of how small they may seem, must be reported. DSLs and Head of schools (or equivalent) have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.
- 27.3** Outcomes First Group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.
- 27.4** Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **outcomesfirstgroup@safecall.co.uk**

28.0 Digital and Remote Learning

Where digital learning and remote learning options are provided for pupils, all staff should be mindful that the Group's and College's **safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

- 28.1** The Group's Acorn Digital Learning provides online teaching for those who currently find themselves without access to a college setting, or are unable to attend college for medical, mental health, anxiety or behavioural reasons. Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template, which have been shared with all Outcomes First Group colleges and can be utilised as required.
- 28.2** Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils up to online services, and staff accessing personal data when working at home. It is recommended that staff are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from college or remotely.
- 28.3** The guidelines for digital learning below must be followed:
- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#), [Net-aware](#), [Digital Parenting Pro](#)
 - If staff are concerned about a comment made online by a pupil or the work they share, the staff member should take a screen shot and report it to the DSL via MyConcern / CPOMS (or the college's existing protocol as long as it is secure).
 - Staff and pupils should be fully dressed and take into account the background/surroundings. Staff should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.
 - The teacher may need to give guidance to pupils to remove items from view. If a pupil is inappropriately dressed or in an unsuitable setting they must be removed from the video call.
 - Staff must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement.

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- If a staff member urgently needs to call a parent or pupil from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made (e.g. an email to the Head of school (or equivalent) or DSL to explain the purpose of the call and any actions taken as a result of it).
- Home filters may block different content at a different level to the college's filtering software; if this appears to be the case for one pupil in the group the teacher should revert to or suggest an alternative resource.
- Take care that any material provided to students to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
- Staff should model good online behaviour in all ways, including the language used to interact with pupils and colleagues, which should be respectful at all times
- College leaders should make clear to staff the operating times for online learning (for example, only during the normal college day); no staff member should engage with or respond to any pupil outside these times.
- Clear guidelines for students connecting to a virtual classroom session will be given by the college and the teacher will check their understanding.
- The same principles apply to virtual meetings between staff and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice for colleges: [teaching online safety in colleges](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS [External visitors guidance](#)
- NSPCC: [Undertaking remote teaching safely](#)
- PSHE Association: [Guidance for teaching PSHE remotely](#)

29.0 Home visits

Where staff need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of pupils and their families. Staff must follow the lone working policy and any local procedures and guidance. This should prescribe that you must at least inform another member of staff of your whereabouts and the time you plan to return to the college. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

30.0 Policy Review

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.

We are part of the Outcomes First Group Family, by working together we will build incredible futures by empowering vulnerable children, young people and adults in the UK to be happy and make their way in the world.

**Outcomes
First
Group.**

Acorn Education And Care
Options Autism